

September 12, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289 SP
)	(Restart-Management Remand)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

LICENSEE'S SECOND SET OF INTERROGATORIES TO UCS
(TRAINING)

Pursuant to 10 C.F.R. §§ 2.740b and 2.741 and to the Atomic Safety and Licensing Board's "Memorandum and Order Following Prehearing Conference" of July 9, 1984, Licensee hereby requests that intervenor Union of Concerned Scientists (UCS) answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of the original or best copy of all documents identified in the response to these interrogatories. Licensee makes this request of UCS in its capacity as a lead intervenor on the issue of training. Licensee has tried to limit its interrogatories of UCS to those areas of training in which UCS has asserted an interest.

Licensee's interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, pursuant to 10 C.F.R. § 2.740(e),

should UCS or any individual acting on its behalf obtain any new or differing responsive information. The request for production of documents is also continuing in nature and UCS must produce immediately any additional documents it, or any individual acting on its behalf, obtains which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e). Licensee notes UCS's continuing obligation applies to interrogatories and requests for production of documents previously filed, particularly, questions to which UCS did not know the answer. See UCS responses to Licensee Interrogatories U-6, U-9, U-10, U-11, U-14, U-15, U-23, U-24, U-25, U-26, U-27 and U-28.

As used hereinafter, "document(s)" mean all writings and records of every type in the possession, control or custody of UCS or any individual acting on its behalf, including, but not limited to, memoranda, correspondence, bulletins, minutes, notes, speeches, articles, transcripts, testimony, voice recordings and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of UCS. Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum) and provide the following information, as applicable: document name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person or persons having possession of

the document. Also identify the specific portion or portions of the document (i.e., pages) upon which UCS relies.

INTERROGATORIES ON TRAINING

U-29. In view of UCS' response to Licensee's Interrogatory U-4, please identify or provide UCS' definition or understand of the following standards:

(1) the skills and knowledge that are necessary to operate the plant under accident or unusual conditions;

(2) tests that are adequate to accurately evaluate whether the operators possess the necessary skills and knowledge;

(3) when memorization constitutes too great a role in the training and testing programs;

(4) the specific "plant procedures and design" about which UCS is concerned that the licensed operator training and tests conform;

(5) what constitutes a proper test review for difficulty and validity;

(6) the "appropriate attitude" in the training and operations staff;

(7) what constitutes "proper implementation of the licensed operator training program;

(8) what constitutes adequate first-hand knowledge and observation by the Reconstituted OARP Review Committee; and

(9) when instructors are "qualified and effective."

U-30. For each item (1) through (9) identified in response to Interrogatory U-29, provide the basis on which UCS'

identification, definition, or understanding is based, including but not limited to (a) the individuals on which opinions the answers are based; (b) all documents relied upon; (c) any criteria that form the basis for UCS' answers.

U-31. Identify all of the specific changes in plant procedures to which UCS refers generally in its answer (subpart 4) to Licensee's Interrogatory U-5.

U-32. For each change identified in response to Interrogatory U-31, identify all of the documents on which you rely in determining that it constitutes a procedural change.

U-33. Identify the specific page or pages of the "Speaker Report" on which UCS relies in its answer to Licensee's Interrogatory U-5, subpart 6.

U-34. Identify the specific factors which constitute the "combination" to which UCS refers in its answer to Licensee's Interrogatory U-5, subpart 7.

U-35. Identify the specific "exams as described on the evidentiary record" to which UCS refers in its answer to Licensee's Interrogatory U-19.

U-36. Explain the basis for your statement, in response to Licensee Interrogatory U-28, that "UCS questions whether the qualifications of the committee members are adequate to permit them as a committee to reach many of the conclusions contained in Chapter V."

U-37. Identify all of the specific qualifications that you believe are lacking among the Reconstituted OARP Committee members.

U-38. Identify all of the statements or conclusions in Chapter V which form the basis for UCS' questioning of the qualifications of the Reconstituted OARP Committee members.

U-39. Identify by name and/or title all individuals in GPUNC that UCS believes the Reconstituted OARP Committee members should contact in order to assess the adequacy of the current licensed operator training program.

U-40. With respect to each individual identified in response to Interrogatory U-39, explain why, in UCS' view, it is necessary that the Committee contact the individual.

U-41. Identify all expert consultants on whom UCS has or will rely in preparing a case on cross-examination of Licensee's witnesses.

U-42. For each individual identified in Interrogatory U-41 above, identify the specific subject area or areas of expertise of the individual on which UCS is relying.

U-43. Identify all persons UCS intends to call as a witness on the remanded issue of training, including individuals UCS may seek to subpoena. For each such person identified above, identify the following:

- (a) the nature or substance of his testimony;
- (b) his qualifications, access to information, or other reason that he is being asked to testify as to the information identified in response to subpart (a) above;
- (c) his position or relationship to UCS at any time, including but not limited to any contracts, consulting

arrangements, advisory positions or other relationships with UCS he has held or holds currently;

(d) all technical documents he has reviewed or will review to prepare his testimony;

(e) all persons (aside from counsel) whom he has consulted or will consult to prepare his testimony;

(f) the nature and substance of any discussions, conversations, communications, and other contacts he has had or will have with the persons identified in response to subpart (e) above;

(g) all documents he intends to rely on or use in support of any opinions, evaluations, conclusions, or recommendations he makes in his testimony;

(h) the current location and custodian of all documents identified in response to subparts (d) and (g) above.

U-44. Identify and produce all documents which UCS intends to introduce in the hearing or through prefiled testimony on the remanded issue of training.

Respectfully submitted,

Deborah B. Bauser

Ernest L. Blake, Jr., P.C.
Deborah B. Bauser

SHAW, PITTMAN, POTTS & TROWBRIDGE
1800 M Street, N.W.
Washington, D.C. 20036
(202)922-1000

Counsel for Licensee

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)	(Restart-Management Remand)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Answers to Intervenor Three Mile Island Alert's Second Set of Interrogatories to General Public Utilities (Training)," accompanied by Affidavits of Richard P. Coe, Eric Gardner, Robert E. Uhrig, Philip R. Clark, Robert L. Long, E. R. Frederick, H. D. Hukill, Samuel L. Newton, Michael J. Ross, Sr., Deborah B. Bauser; "Licensee's Answers to Intervenor Three Mile Island Alert's Second Request for Production of Documents to General Public Utilities (Training)"; "Licensee's Answers to Union of Concerned Scientists' First Set of Interrogatories to General Public Utilities (Training)"; and "Licensee's Second Set of Interrogatories to UCS (Training)" were served this 12th day of September, 1984, by hand delivery to the party identified with an asterisk and by deposit in the U.S. mail, first class, postage prepaid, to the other parties on the attached Service List.

Deborah B. Bauser

 Deborah B. Bauser

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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METROPOLITAN EDISON COMPANY) Docket No. 50-289 SP
) Restart
(Three Mile Island Nuclear)
Station, Unit No. 1))

Service List

Administrative Judge
Ivan W. Smith
Chairman, Atomic Safety &
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
Sheldon J. Wolfe
Atomic Safety & Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
Gustave A. Linenberger, Jr.
Atomic Safety & Licensing
Board
U.S. Nuclear Regulatory
Washington, D.C. 20555

Jack Goldberg, Esq.
Office of Executive Legal Dtr.
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Chairman, Atomic Safety &
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Chairman, Atomic Safety &
Licensing Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Thomas Y. Au, Esq.
Office of Chief Counsel
Dept. of Environmental Resources
505 Executive House
P.O. Box 2357
Harrisburg, PA 17120

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Norman Aamodt
R. D. 5
Coatesville, PA 19320

Joanne Doroshov, Esq.
The Christic Institute
1324 North Capitol Street
Washington, D.C. 20002

Mr. Henry D. Hukill
Vice President
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Michael F. McBride, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Suite 1100
Washington, D.C. 20036

Michael W. Maupin, Esq.
Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, VA 23212

Administrative Judge
Christine N. Kohl
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Ellyn R. Weiss, Esq.
William S. Jordan, III, Esq.
Harmon, Weiss & Jordan
2001 S Street N.W., Suite 430
Washington, D.C. 20009

*Lynne Bernabei, Esq.
Government Accountability
Project
1555 Connecticut Avenue
Washington, D.C. 20009

Ms. Louise Bradford
TMI ALERT
1011 Green Street
Harrisburg, PA 17102

Administrative Judge
Gary J. Edles, Chairman
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
John H. Buck
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555